

## MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

April 1, 2021

### VIA ECF

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

We write on behalf of the Plaintiffs' Executive Committees to request an extension of time by which we must submit a reply in support of our Fed.R.Civ.P. 72 objections to the portions of the Magistrate Judge's October 21, 2020 Opinion & Order and February 1, 2021 Opinion & Order which denied Plaintiffs' motion to compel the Federal Bureau of Investigation (FBI) refusal to produce certain materials and information (ECF No. 6629). Plaintiffs have been deposing Saudi witnesses this week and have additional depositions scheduled for next week, along with other scheduling complications. We therefore ask that this Court grant our request to extend the time by which the reply is due from April 2, 2021 to April 16, 2021. We have asked the government for its position and it has advised that it consents to the request. This is the first request for an extension of time.

April 1, 2021

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Respectfully submitted,

KREINDLER & KREINDLER

/s/ Megan W. Benett

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For the MDL 1570 Plaintiffs' Exec.  
Committee for Personal Injury and Death  
Claims

COZEN O'CONNOR

/s/ Sean P. Carter

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For the MDL 1570 Plaintiffs' Exec.  
Committee for Commercial Claims

MOTLEY RICE

/s/ Robert T. Haefele

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For the MDL 1570 Plaintiffs' Exec.  
Committee for Personal Injury and Death  
Claims